

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

**JODI C. MAHDAVI,**

**Plaintiff,**

**v.**

**NEXTGEAR CAPITAL, INC., *et al.*,**

**Defendants.**

**Case No.: 1:14-cv-00648-TSE-TCB**

**MOTION TO ADMIT ROBERT N. KELLY *PRO HAC VICE***

COMES NOW Defendant P.A.R. Services, Inc., by undersigned counsel, pursuant to Local Rule 83.1(D)(1), and hereby requests that this Court enter an order admitting Robert N. Kelly to practice before this Court *pro hac vice* in this case, and in support thereof submits the Application of Mr. Kelly attached hereto as **Exhibit A**. Undersigned counsel is a member of the Bar of this Court, and I hereby sponsor the admission of Robert N. Kelly as counsel *pro hac vice* in this action.

The Plaintiff and Defendant NextGear Capital, Inc. do not oppose this Motion.

Dated: August 8, 2014.

Respectfully submitted,

P.A.R. SERVICES, INC.,  
By counsel:

/s/ James N. Markels  
James N. Markels (VA Bar No. 68399)  
JACKSON & CAMPBELL, P.C.  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 8th day of August, 2014, I will electronically file the foregoing with the Clerk of Court using the CM/ECF System, which will then send a notification of such filing (NEF) to:

Jonathan E. Levine, Esquire (VA Bar No. 45572)  
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*Counsel for Defendant P.A.R. Services, Inc.*

# EXHIBIT A

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

APPLICATION TO QUALIFY AS A FOREIGN ATTORNEY UNDER LOCAL CIVIL RULE 83.1(D) AND LOCAL CRIMINAL RULE 57.4

In Case Number 1:14-cv-648, Case Name Mahdavi v. NextGear Capital, Inc.

Party Represented by Applicant: P.A.R. Services, Inc.

To: The Honorable Judges of the United States District Court for the Eastern District of Virginia

## PERSONAL STATEMENT

FULL NAME (no initials, please) Robert Noon Kelly

Bar Identification Number 287276 State D.C.

Firm Name Jackson & Campbell, P.C.

Firm Phone # 202-457-1600 Direct Dial # 202-457-1647 FAX # 202-457-1678

E-Mail Address rkelly@jackscamp.com

**Office Mailing Address** 1120 20th Street, N.W., South Tower, Third Floor, Washington, D.C. 20036

Name(s) of federal court(s) in which I have been admitted U.S. Dist. Ct. for D. Md. and D.C.; U.S. Ct. App. for D.C., 4th, and 5th Circuits

I certify that the rules of the federal court in the district in which I maintain my office extend a similar *pro hac vice* admission privilege to members of the bar of the Eastern District of Virginia.

I have not been reprimanded in any court nor has there been any action in any court pertaining to my conduct or fitness as a member of the bar.

I hereby certify that, within ninety (90) days before the submission of this application, I have read the Local Rules of this Court and that my knowledge of the Federal Rules of Civil Procedure, the Federal Rules of Criminal Procedure, and the Federal Rules of Evidence is current.

I am ☐ am not ☒ a full-time employee of the United States of America, and if so, request exemption from the admission fee.

(Applicant's Signature)

I, the undersigned, do certify that I am a member of the bar of this Court, not related to the applicant; that I know the applicant personally, that the said applicant possesses all of the qualifications required for admission to the bar of this Court; that I have examined the applicant's personal statement. I affirm that his/her personal and professional character and standing are good, and petition the court to admit the applicant *pro hac vice*.

(Signature)

James N. Markels

(Typed or Printed Name)

(Date)

68399

(VA Bar Number)

**Court Use Only:**

Clerk's Fee Paid                      or Exemption Granted                     

The motion for admission is GRANTED or DENIED

(Judge's Signature)

(Date)

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**Plaintiff,**

**v.**

**NEXTGEAR CAPITAL, INC., *et al.*,**

**Defendants.**

**Case No.: 1:14-cv-00648-TSE-TCB**

**ORDER GRANTING  
“MOTION TO ADMIT ROBERT N. KELLY *PRO HAC VICE*”**

**UPON CONSIDERATION** of Defendant P.A.R. Services, Inc.’s Motion to Admit Robert N. Kelly *Pro Hac Vice*, and any opposition thereto, and

**IT APPEARING** that the Motion should be granted, it is hereby

**ORDERED**, that the Motion to Admit Robert N. Kelly *Pro Hac Vice* be, and hereby is, **GRANTED**; and it is hereby

**ORDERED**, that Robert N. Kelly be, and hereby is, admitted as counsel *pro hac vice* in the above-captioned matter on behalf of Defendant P.A.R. Services, Inc.

By my hand this \_\_\_\_ day of \_\_\_\_\_, 2014.

\_\_\_\_\_  
Senior Judge T.S. Ellis, III

Copies to:

James N. Markels, Esquire  
*Counsel for Defendant P.A.R. Services, Inc.*

James D. Bragdon, Esquire  
*Counsel for Defendant NextGear Capital, Inc.*

Jonathan E. Levine, Esquire  
*Counsel for Plaintiff*